

1 QUINN EMANUEL URQUHART & SULLIVAN, LLP

Charles K. Verhoeven (Bar No. 170151)

2 charlesverhoeven@quinnemanuel.com

David A. Perlson (Bar No. 209502)

3 davidperlson@quinnemanuel.com

Melissa Baily (Bar No. 237649)

4 melissabaily@quinnemanuel.com

John Neukom (Bar No. 275887)

5 johnneukom@quinnemanuel.com

Jordan Jaffe (Bar No. 254886)

6 jordanjaffe@quinnemanuel.com

50 California Street, 22nd Floor

7 San Francisco, California 94111-4788

Telephone: (415) 875-6600

8 Facsimile: (415) 875-6700

9 Attorneys for WAYMO LLC

10 UNITED STATES DISTRICT COURT

11 NORTHERN DISTRICT OF CALIFORNIA

12 SAN FRANCISCO DIVISION

13 WAYMO LLC,

14 Plaintiff,

15 vs.

16 UBER TECHNOLOGIES, INC.;
17 OTTOMOTTO LLC; OTTO TRUCKING
LLC,

18 Defendants.

CASE NO. 3:17-cv-00939-WHA

**PLAINTIFF WAYMO'S
SUPPLEMENTAL SUBMISSION IN
CONNECTION WITH ITS RESPONSE
TO SECOND ORDER RE SCHEDULING
OF DEPOSITIONS (DKT. 679)**

Below, Waymo respectfully provides dates of availability for each of the Waymo witnesses that Defendants included in their list of top ten list of deponents. (Dkt., 698.) Waymo could not provide availability for all of these witnesses in its Response to Second Order re Scheduling of Depositions because, as Waymo explained in its Response, Defendants failed and refused to provide their list of top ten deponents to Waymo in advance of their filing at 4:45 PM. (Dkt. 699.)

Name	Proposed Deposition Date
Drew Ulrich	July 13
Zachary Morris	July 14
Larry Page ¹	July 17
William McCann	July 28
John Krafcik	August 2
Pierre-Yves Droz	August 4
Sam Lenius	[no known conflict dates as of this filing]

Waymo respectfully requests that the Court take under consideration the available dates above and existing scheduling conflicts of its witnesses before assigning deposition dates.

DATED: June 22, 2017

QUINN EMANUEL URQUHART & SULLIVAN,
LLP

By /s/ Charles K. Verhoeven

Charles K. Verhoeven
Attorneys for WAYMO LLC

¹ Defendants previously sought Mr. Pages's deposition during the PI Phase expedited discovery, and Magistrate Judge Corley granted Waymo's protective order motion under the apex doctrine. (Dkt. 276.) Waymo provides a proposed deposition date for Mr. Page here but intends to promptly seek a protective order now that Defendants have renewed their request for this apex deposition. Waymo will work with the Special Master and Defendants to try to resolve this issue but, if necessary, will seek relief from Magistrate Judge Corley through her established procedures.